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**Exhibit A**

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**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**OAKLAND DIVISION**

*In re:*

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER GRANTING  
RENEWED MOTION OF THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO LIFT  
THE AUTOMATIC STAY TO PERMIT  
CERTAIN PLAINTIFFS' PERSONAL  
INJURY CLAIMS TO PROCEED IN  
STATE COURT**

1           Upon the *Renewed Motion of the Official Committee of Unsecured Creditors to Lift the*  
2 *Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court* (the  
3 "**Motion**")<sup>1</sup>; the Court having reviewed the Motion and having considered the statements of  
4 counsel and the evidence adduced regarding the Motion at a hearing before the Court (the  
5 "**Hearing**"); the Court finding that (a) the Court has jurisdiction over this matter under 28 U.S.C.  
6 §§ 157 and 1334, (b) venue is proper in this district under 28 U.S.C. §§ 1408 and 1409, (c) this is  
7 a core proceeding under 28 U.S.C. § 157(b)(2), and (d) notice of the Motion and the Hearing was  
8 sufficient under the circumstances; and (e) the Court having determined that the legal and factual  
9 bases set forth in the Motion and at the Hearing further establish just cause for the relief granted;

10           **IT IS HEREBY ORDERED THAT:**

- 11           1.       The Motion is GRANTED as set forth herein.
- 12           2.       The automatic stay is terminated to allow six State Court Actions to proceed, as  
13 directed by the State Court.
- 14           3.       The automatic stay shall remain in full force and effect for all other purposes  
15 including with respect to the enforcement of any judgment against the Debtor that may be obtained  
16 because of the termination of the automatic stay as provided above; *provided* that nothing herein  
17 shall prevent the entry of a judgment against the Debtor and/ or the initiation of proceedings  
18 consistent with California Insurance Code Section 11580(b)(2) once a judgment is entered.
- 19           4.       Notwithstanding Bankruptcy Rule 4001(a)(4), or any other Bankruptcy Rule, this  
20 Order shall be immediately effective and enforceable upon its entry.
- 21           5.       This Court shall retain exclusive jurisdiction over any matters arising from or  
22 related to the implementation, interpretation or enforcement of this Order.

23  
24                               \*\*\*END OF ORDER\*\*

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<sup>1</sup> Capitalized terms not defined herein have the meaning ascribed to them in the Motion.